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8 Attorneys for Defendants

9  
10 UNITED STATES DISTRICT COURT  
11  
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 RED EAGLE ENTERTAINMENT, LLC,  
a California limited liability company; and  
14 MANETHEREN, LLC, a California  
limited liability company;

15 Plaintiffs,

16 vs.

17 BANDERSNATCH GROUP, INC., a  
South Carolina corporation; HARRIET P.  
18 MCDOUGAL, an individual; and DOES  
19 1through 20, inclusive,

20 Defendants.

21 Case No.: 2:15-cv-1038

22 Assigned for all Purposes to:  
Hon. Stephen V. Wilson

23 **DEFENDANTS' NOTICE OF  
MOTION TO DISMISS THE  
SECOND, THIRD, AND  
FOURTH CAUSES OF ACTION  
CONTAINED IN PLAINTIFFS'  
COMPLAINT PURSUANT TO  
FED. R. CIV. P. 12(b)(6)**

24 Complaint Filed: Feb. 12, 2015

25 Date: Monday, April 27, 2015  
Time: 1:30 p.m.  
Courtroom 6

26 [Filed concurrently herewith  
Defendants' Motion to Dismiss,  
Defendants' Request for Judicial  
Notice, and [Proposed] Order]

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on April 27, 2015, at 1:30 p.m., in Courtroom  
3 6 of the United States Courthouse located at 312 North Spring Street, Los Angeles,  
4 CA 90012, Defendants Bandersnatch Group, Inc. and Harriet P. McDougal, shall  
5 and hereby do move, jointly and severally, for an order dismissing three of the  
6 causes of action contained in Plaintiffs Red Eagle Entertainment, LLC's and  
7 Manetheren, LLC's Complaint herein on the grounds set forth in Defendants'  
8 Motion to Dismiss the Second, Third, and Fourth Causes of Action Contained in  
9 Plaintiffs' Complaint Pursuant to Fed. R. Civ. P. 12(b)(6).

10 Defendants bring this motion pursuant to Federal Rules of Civil Procedure  
11 Rule 12(b)(6). This motion is made following the conference of counsel pursuant  
12 to L.R. 7-3 which took place on March 10, 2015.

13 This motion to dismiss is based on this Notice of Motion, the Memorandum  
14 of Points and Authorities filed concurrently herewith, the Request for Judicial  
15 Notice filed concurrently herewith, and upon such other and further oral and  
16 documentary evidence and argument as may be presented to the Court at the time of  
17 the hearing.

18 DATED: March 19, 2015

**JOHNSON & JOHNSON LLP**

20 By \_\_\_\_\_ /s/ Neville L. Johnson  
21 Neville L. Johnson  
22 Douglas L. Johnson  
23 Alyson C. Decker  
24 Attorneys for Defendants